

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS TX 75202-2733

MAR 0 9 2011

VIA UPS

Eric F. Pastor Pastor, Behling & Wheeler, LLC 2201 Double Creek Drive, Suite 4004 Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas Unilateral Administrative Order, CERCLA Docket No. 06-05-05A Draft Removal Action Report



Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated February 24, 2011. With this letter, the EPA approves the Removal Action Report (Report) with the following modifications:

- 1. (Section 2.2, p. 6; Section 2.6.1, p. 9; and Section 2.6.2, p. 10): The Report provides several scheduled dates for various disposal activities, which occurred near the time that the Report was submitted. The Report shall be revised to provide the actual dates for these activities.
- 2. (Section 3.2, p. 16): The Report states that the soil concentrations were within the acceptable risk range. The Report shall also include that the risk range is based on an industrial/commercial exposure scenario.
- 3. (Section 4.0, p. 17): The text of the Report shall document the objectives of the Settlement Agreement and describe how those objectives were met.
- 4. (Appendix A, Photograph 18): The caption for this photograph describes a view to the north. The view is actually to the south and the caption shall be corrected to reflect this.
- 5. The Report shall provide the demobilization date for the removal action (prior to the final disposal of the remaining containers).
- 6. The Report shall include the removal action work plan from the Settlement Agreement as an appendix to this Report.

These modifications shall be incorporated in the referenced document and copies provided to the notification list within 15 days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller, P.E.\
Remediation Project Manager

cc:

Luda Voskov (TCEQ)